REMARKS

Claims 1-27 are pending in the Application.

Claims 1-27 stand rejected.

I. AMENDMENT TO THE SPECIFICATION

The Applicants have hereinabove rewritten the paragraph beginning at page 16, line 12 to correct certain typographical errors with respect to reference numerals referred to therein.

The Applicants have hereinabove rewritten the paragraph beginning at page 16, line 12 to correct certain typographical errors with respect to reference numerals referred to therein. These amendments conform the written description with FIGURE 3 to which they pertain. Thus, the Applicants respectfully that no new matter has been added by the amendment to the written description.

II. AMENDMENT TO THE DRAWINGS

The Applicants have amended FIGURE 3 to delete the path between blocks 318 and 326. This path was inadvertently included in the formal drawings filed on April 9, 2001. The Applicants note that in the informal drawings originally filed on December 19, 2000, there was no path between blocks 318 and 326 of FIGURE 3. Therefore, the Applicants respectfully submit that no new matter is added by the Amendment to the Drawings.

III. REJECTION UNDER 35 U.S.C. § 103

Claims 1-25 have been rejected under 35 U.S.C. § 103 as being unpatentable over *Traversat, et al*, U.S. Patent No. 6,366,954 ("*Traversat*") in view of *Bachmann, et al*, U.S. Patent No. 6,085,188 ("*Bachmann*"). The Applicants respectfully traverse the rejections of claims 1-27 under 35 U.S.C. § 103.

Claim 1 is directed to a search method. The method includes determining if a first parameter has a first predetermined value. If the first parameter has the first predetermined value, the method returns a value of each of one or more selected members of a first node, the first node being referenced by a value of a first member of a second node in response to the first member of the second node having a predetermined type.

Traversat is alleged to disclose all of the limitations of claim 1 but for the step of returning a value of each of one or more selected members of the first node. (Paper No. 7, page 2.) The Applicants respectfully disagree.

Traversat is directed methods for exchanging data between a Java System Database (JSD) entry and an LDAP directory service. (*Traversat*, column 1, lines 1-5.) In particular, *Traversat* is related to the transfer and arrangement of configuration data among components or storage areas in a computer network. (*Traversat*, column 1, lines 23-26.)

With respect to determining if a first parameter has a predetermined value, this step is purported to be taught by *Traversat* in disclosing a distinguished name ("DN") as the first parameter, and the teachings of *Traversat* related thereto. (*See* Paper No. 7, page 2) (citing *Traversat*, column 6, lines 13-29). However, the teaching referred to discloses a distinguished name as an entry, which are effectively nodes, in a directory. (*See Traversat*, column 6, lines 17-18.) A DN defines an absolute path to the node having the distinguished name. (*Traversat*, column 7, lines 74-35.) (Note that more typically the DN as used in *Traversat* is referred to as a relative distinguished name (RDN). (*See e.g.,* HEINZ JOHNER, ET AL., UNDERSTANDING LDAP, pp. 20-29 (1998)). A DN is composed of a sequence of RDNs.) An entry is a collection of attributes; attributes can have one or more values and belong to a particular type. (*Traversat*, column 6, lines 21-23.) The teaching referred to is an exemplary directory tree. (*Traversat*, column 6, lines 45 through column 7, line 5.) There is nothing identified therein with respect to determining if a DN has some predetermined value.

Additionally, *Traversat* is asserted to teach that if the first parameter has a first predetermined value in disclosing the business unit ("BU") DN. (Paper No. 7, page 2) (citing *Traversat*, column 6, lines 29-44). The teaching relied upon does not disclose determining if a first parameter has a first predetermined value either generally, as if the value is "BU." The BU entry is not a value of the distinguished named country (C). A value of the country attribute might be United States (US), France (FR), or Great Britain (GB), for example. (*See e.g., Traversat*, FIGURE 2, and column 6, lines 45-48.) *Traversat* teaches that entries representing countries often appear at the top of the tree under the DN followed by entries representing business units, for example, followed by more specific entries representing any thing from printers, client computers or network users. (*Traversat*, column 6, lines 30-35.)

Note also that *Traversat* admittedly fails to disclose returning a value of one or more selected members of a first node. (Paper No. 7, page 2.) However, claim 1 requires that the step of returning a value of each of one or more selected members of a first node is the result of determining that the first parameter has a first predetermined value. However, if *Traversat* teaches determining if the first parameter has a first predetermined value as alleged, there is nothing identified in *Traversat* as a consequence of such determinations. In other words, there is nothing identified in *Traversat* that results from the conditional "if the first parameter has the first predetermined value" being satisfied. This is illogical and necessarily demonstrates that *Traversat* does not teach or suggest determining if a first parameter has a first predetermined value and, if the first parameter has the predetermined value, returning a value of each or one or more selected members of a first node, as recited in claim 1.

Additionally, the admitted absence of teaching in *Traversat* with respect to returning a value of each of one or more selected members of a first node deprives *Traversat* of the antecedent with respect to the first node being referenced by a value of a first member of the second node in response to the first member of the second node having a predetermined type. That is, it is the missing "returning a value of each of one or more selected members of a first node" provides the logical connection between the

first parameter having the first predetermined value, and the first node being referenced by a member of a second node... . Without the step of "returning a value of each of one or more selected members of a first node," there is nothing that relates the conditional "if the first parameter.... " and "the first node being referenced by a value of a first member of a second node in response to the first member of the second node having a predetermined type" as recited in claim 1. This refutes the assertion that *Traversat* teaches these elements of claim 1.

The teaching in *Traversat* which purportedly discloses the first node being referenced by a value of a first member of a second node in response to the first member of the second node having a predetermined type discloses an exemplary LDAP directory tree. (Paper No. 7, page 2) (citing *Traversat*, column 6, line 45 through column 7, line 15). FIGURE 2A and the associated written description illustrate a sequence of LDAP nodes (or entries) arranged in a tree; each node being referenced by a DN (more precisely as described above the DN of a node is the full path, and each branch in the tree is identified by a relative distinguished name (RDN) with the DN constituting the sequence of RDNs between the tree root and the branch. (*See e.g.,* HEINZ JOHNER, ET AL., UNDERSTANDING LDAP, pp. 20-29 (1998)). Thus, for example, node **204** has the RDN "O = Netscape", and the DN is "O = Netscape, C = US." (Note that *Traversat* refers to this full path as an absolute address or a "full DN." *Traversat*, column 7, lines 34-35.) Additionally, an entry, or node, may include one or more attributes composed of a type and value pair. (HEINZ JOHNER, ET AL., UNDERSTANDING LDAP, at 21; *See also Traversat*, column 6, lines 64-65.) Nothing is identified in these teaching that discloses the first node being referenced by a value of a first member of a second node in response to the first member of a second node having a predetermined type.

Considering now the step of returning a value of each of one or more selected members of a first node, admittedly missing in *Traversat*, the Examiner contends that this element of claim 1 is supplied by *Bachmann*. However, without admitting that *Bachmann* teaches returning the value of each of one or more selected members of a first node, the Applicants respectfully contend that *Bachmann* cannot be relied upon to cure

the admitted deficiency in *Traversat*. The element in claim 1, as discussed hereinabove, recites "if the first parameter has the first predetermined value, returning a value of each of one or more selected members of a first node... ." Also discussed hereinabove, the Examiner has identified no action performed by *Traversat*, if the purported first parameter has the alleged first predetermined value. The admittedly missing limitation in *Traversat* cannot be supplied by engrafting teaching from *Bachmann* into the claim element. (The Applicants respectfully submit that the source of this problem, in fact, arises because *Traversat* does not teach the step of determining if a first parameter has a first predetermined value the first predetermined parameter having the first predetermine value, at all. In other words, even assuming, solely for the sake of argument, that *Traversat* taught: "if a first parameter had a first predetermined value, then do a step "X", it is not permissible to excise the operation "X" and replace that operation with "Y" regardless of whether "Y" was taught by a secondary reference. Such a modification would change the principle of operation of *Traversat*. Where a proposed modification changes the principle of operation of a reference, there is no motivation to combine or modify the references. MPEP § 2143.01.

This conclusion is also mandated by the asserted motivation for combining *Traversat* and *Bachmann*. The Examiner asserts that it would have been obvious to combine the two in order to provide a faster and more efficient method to support LDAP searches. Such a motivation or suggestion to combine is not sufficient to support a *prima facie* showing of obviousness. A motivation or suggestion to modify or combine the references must be found in the references themselves, the knowledge of persons of ordinary skill in the art, or the nature of the problem to be solved. MPEP § 2143.01. Furthermore, the teachings with respect to a motivation or suggestion to combine or modify references must be clear and particular, and broad conclusory statements regarding the teachings standing alone are not evidence. *In re Lee*, 277 F.3d 1338, 1343, 61 U.S.P.Q.2d 1430, 1433-34 (Fed. Cir. 2002); *In re Kotzab*, 217 F3d 1365, 1370, 55 U.S.P.Q.2d 1313, 1317 (Fed. Cir. 2000); *In re Dembiczak*, 175 F3d 994, 999, 50 U.S.P.Q.2d 1614, 1616 (Fed. Cir. 1999).

Thus, the references, alone or in combination, have not been shown to teach or suggest all of the limitations of claim 1. Neither is there a motivation or suggestion to modify the references to make the invention of claim 1. Therefore, the Applicants respectfully contend that a *prima facie* showing of obviousness has not been made with respect to claim 1, and claim 1 is allowable under 35 U.S.C. § 103 over *Traversat* and *Bachmann.*

Claims 10 and 19 drawn, respectively, to a computer program product and a data processing system for performing operations paralleling the methods of claim 1, have been rejected on the same basis as claim 1. (Paper No. 7, pages 2-3.) For at least the reasons discussed hereinabove in conjunction with claim 1, the Applicants also respectfully contend that claims 10 and 19 are also allowable under 35 U.S.C. § 103 over *Traversat* and *Bachmann.*

Claim 2 depends from claim 1 and recites the method thereof and further including the step of determining if a second member of the second node matches a value of a second parameter. *Traversat* allegedly teaches the limitation of claim 2 in disclosing a process for retrieving a configuration data item from an LDAP directory service when the data item is not available on a Java System Database (JSD) server. (Paper No. 7, page 3) (citing *Traversat*, column 12, lines 1-31). As discussed hereinabove, neither *Traversat* nor *Bachmann* alone or in combination teach a second node as recited in claim 2 through its incorporation by reference of the limitations of claim 1, nor do *Traversat* nor *Bachmann* teach a first member of the second node as recited in claim 2 through its dependence from claim 1. Therefore, it necessarily follows that neither *Traversat* nor *Bachmann*, alone or in combination, teach a second member of the second node as recited in claim 2. Furthermore, no motivation or suggestion for combining or modifying the references beyond that asserted with respect to claim 1 has been supplied. Thus, for these reasons, and those discussed in conjunction with claim 1, the Applicants also respectfully assert that a *prima facie* showing of obviousness has not been made with respect to claim 2. Therefore, claim 2 is allowable under 35 U.S.C. § 103 over

Traversat and *Bachmann*. Likewise, claims 11 and 20, rejected on the same basis as claim 2, are also allowable under 35 U.S.C. § 103 over the cited art.

Claim 3 is directed to the method of claim 2 in which the step of returning the value of each of one or more members of the first node is in response to the second member of the second node matching the value of the second parameter. Claim 3 has been rejected on teachings in *Traversat* directed to a process for initializing a JSD server using an LDAP directory service, and, in particular to, retrieving all entries in a JSD context from the LDAP directory. (Paper No. 7, page 3) (citing *Traversat*, column 10, lines 16-38). The teaching states that the JSD server retrieves all the entries in the LDAP directory in the JSD context. (*Traversat*, column 10, lines 17-19.) JSD paths corresponding to attributes in the LDAP entries are retrieved and configuration data is stored in the JSD entry. (*Traversat*, column 10, lines 21-25.) The remaining teaching relied upon by the Examiner illustrates a format of a user-specific data leaf node in the JSD server and a user entry in an LDAP directory server. (*Traversat*, column 10, lines 25-38.) Nothing is identified in these teachings that discloses returning a value of each of one or more members of a first node in response to a second member of a second node matching the value of a second parameter. The aforementioned teachings are directed to mapping LDAP directory data into a JSD server to provide configuration data that is not otherwise in the JSD server. (*Traversat*, column 9, line 66 through column 10, line 38.) Thus, for at least these reasons and those discussed hereinabove with conjunction with, *inter alia*, claim 1, the Applicants respectfully assert that neither *Traversat* nor *Bachmann*, alone or in combination, teach or suggest all of the limitations of claim 3. Also, no further motivation or suggestion for combining or modifying the references beyond that discussed in conjunction with claim 1 has been provided. Therefore, the Applicants respectfully contend that a *prima facie* showing of obviousness has not been made with respect to claim 3 and claim 3 is, thus, allowable under 35 U.S.C. § 103 over *Traversat* and *Bachmann*. Also, claims 12 and 21 rejected on the same basis as claim 3 are allowable under 35 U.S.C. § 103 over *Traversat* and *Bachmann* for at least these reasons.

Claim 4 is directed to the method of claim 1 and further including the step of returning values of a selected set of members of the second node. Claim 4 has been rejected on teaching in *Traversat* disclosing that legacy systems can use a meta directory to determine which attributes of a particular type are needed to determine which attributes of a particular type are needed before accessing an entry, and, when retrieving the value from the entry, the legacy system can use the information learned from the meta directory to extract only values for those attributes sought by the legacy system. (Paper No. 7, page 3) (citing *Traversat*, column 11, lines 21-41). In particular, a meta directory may be used when a JSD server needs to retrieve configuration data from the LDAP server; the meta directory allows the LDAP server to quickly determine whether a particular type (i.e., RDN) has a certain attribute. (*Traversat*, column 11, lines 24-29.) *Traversat* has not been shown to teach returning values of a selected set of members of the second node as recited in claim 4. Thus, neither *Traversat* or *Bachmann*, alone or in combination, teach or suggest all of the limitations of claim 4. Additionally, no further motivation for modifying or combining the references beyond that stated in conjunction with claim 1 has been provided. Consequently, the Applicants respectfully assert that a *prima facie* showing of obviousness has not been made with respect to claim 4, and claim 4 is thus allowable under 35 U.S.C. § 103 over *Traversat* and *Bachmann*. Additionally, claims 13 and 22, rejected on the same basis as claim 4, are also allowable under 35 U.S.C. § 103 over the cited art.

Claim 5 depends from claim 4 and recites the method thereof and further including the step of determining if a second member of the second node matches the value of the second parameter, and wherein the step of returning values of the selected set of members of the second node is in response to the second member of the second node matching the value of the second parameter. Claim 5 has been rejected over teaching in *Traversat*, discussed hereinabove, illustrating an exemplary LDAP tree. (Paper No. 7, page 4) (citing *Traversat*, column 6, line 45 through column 7, line 15). Note that there is nothing identified in that teaching that discusses a matching step, nor would one be expected inasmuch as the teaching is confined to an illustration of an

exemplary LDAP directory tree. Moreover, this teaching is purported to disclose the step of determining if a second member of the second node matches the value of the second parameter. However, nothing is identified in *Traversat* that purports to disclose what happens if the second member of the second node matches the value of the second parameter. The Examiner relies on *Bachmann* as teaching that the step of returning values of the selected set of members of the second node is in response to the second member of the second node matching the value of the second parameter. (Paper No. 7, page 4.) Thus, either *Traversat* is silent as to a consequence of determining if a second member of a second node matches the value of the second parameter, or teaches something other than returning values of the selected set of members of the second node in response to the second member of the second node matching said value of the second parameter. The first alternative is illogical; if *Traversat* were to teach determining if a second member of the second node matches the value of the second parameter, it would be expected that some consequence flows therefrom, that is, there is some reason for making the determination. The Examiner does not contend that *Traversat* teaches something other than returning values of the selected set of members of the second node in response thereto; but such a contention could not be cured by excising the teaching from *Traversat* and substituting disclosure in *Bachmann* engraft the claim element into *Traversat*. As discussed hereinabove, such a modification would change the principle of operation of *Traversat*. In such a circumstance, there is no suggestion to modify or combine references. MPEP § 2143.01. Thus the deficiencies in *Traversat* are not used by the alleged teachings in *Bachmann*. Additionally, for the reasons discussed hereinabove, neither *Traversat* or *Bachmann*, alone or in combination, teach or suggest the second node as recited in claim 5 through its dependency from base claim 1. Thus, because the references, alone or in combination have not been shown to teach or suggest all of the limitations of claim 5, nor is there a motivation or suggestion to combine the references on which a *prima facie* showing of obviousness may be predicated, the Applicants respectfully contend that claim 5 has not been shown to be *prima facie* obvious over *Traversat* and *Bachmann*. Therefore, claim 5 is allowable under

35 U.S.C. § 103 over *Traversat* and *Bachmann*. Additionally, claims 14 and 23, rejected on the same basis as claim 5, are also allowable under 35 U.S.C. § 103 over the cited art.

Claim 6 is directed to the method of claim 1 and further including the step of, if the first parameter has the first predetermined value, returning a value of each of one or more selected members of the third node, the third node being referenced by a value of a first member of the first node in response to the first member of the first node having the predetermined type. *Traversat* allegedly teaches if a first parameter has a first predetermined value. (Paper No. 7, page 4) (citing *Traversat*, column 6, lines 29-44). However, again, *Traversat* itself has not been identified as teaching a consequence thereof. *Bachmann* is purported to teach returning a value of each of one or more selected members of a third node. (Paper No. 7, page 4) (citing *Bachmann*, column 8, lines 35-59). With respect to the first parameter having a first value, the teaching relied upon in *Traversat* has been discussed hereinabove in conjunction with claim 1. With respect to the step of returning a value of each of one or more selected members of a third node, the Examiner refers to teaching in *Bachmann* directed to a relational database management system as a backing store for an LDAP directory service. (Paper No. 7, page 4) (citing *Bachmann*, column 8, lines 35-59). By the plain terms of the teaching there's nothing that refers to returning of value of one or more selected members of a third node. Nor is there teaching in which the third node is referenced by value of a first member of the first node in response to the first member of the first node having a predetermined type. In particular, the teaching, with respect to the third node referenced by member of the first node, is purportedly taught by *Bachmann* in disclosing entries in a naming hierarchy being mapped into first and second relational tables, namely, a parent table and a descendent table which are used to filter lists of entries returned from a search to ensure that only entries within a given search scope are retained for evaluation. (*Bachmann*, column 8, lines 50-64.) The teaching relied upon as disclosing returning a value of one or more selected members of a third node discusses an SQL query for subtree search and the mapping of a naming hierarchy into first and second relational tables referred to above. (*Bachmann*, column 8, lines 35-59.) Again, there is nothing in

this teaching in *Bachmann* that discloses returning a value of each of one or more selected members of the third node, the third node being referenced by a value of a first member of the first node in response to the first member of the first node having a predetermined type. Thus, neither *Traversat* nor *Bachmann* alone or in combination have been shown to teach or suggest all of the limitations of claim 6. Additionally, no further motivation or suggestion for modifying or combining the references other than that stated in conjunction with claim 5 has been provided. Thus, for at least the aforesaid reasons, the Applicants respectfully assert that claim 6 has not been shown to be *prima facie* obvious over *Traversat* and *Bachmann*. Similarly, claims 15 and 25, rejected on the same basis as claim 6 are also allowable under 35 U.S.C. § 103 over the cited references.

Claim 7 depends from claim 6 and recites the method thereof in which the selected members of the first node and the selected members of the third node are selected in response to a value of a second parameter. Claim 7 has been rejected on teaching in *Bachmann* disclosing LDAP search function in which a relational database management system is used as an LDAP backing store. (*Traversat*, column 7, line 65 through column 8, line 59.) In particular, the teaching relied upon discloses SQL queries for LDAP search functions for three scenarios, a base search, a one-level search and a subtree search. (*Traversat*, column 7, line 65 through column 8, line 59.) A base search, one-level search and subtree search are the three types of searches specified in the LDAP protocol. (*Bachmann*, column 6, lines 5-12.) Again, nothing has been identified that teaches or suggests that the selected members of a first node and selected members of a third mode are selected in response to a value of a second parameter as recited in claim 7. Thus, for at least this reason and those recited hereinabove in conjunction with the claims from which claim 7 depends, the Applicants respectfully contend that neither *Traversat* nor *Traversat* or *Bachmann* in combination have been shown to teach or suggest all of the limitations of claim 7. Additionally, no further motivation or suggestion for modifying the references other than that stated in conjunction with claim 6 has been provided. Therefore, the Applicants respectfully assert that a *prima facie*

showing of obvious has not been made with respect to claim 7. Therefore, claim 7 is allowable under 35 U.S.C. § 103 over *Traversat* and *Bachmann*. Additionally, claims 16 and 26, which have been rejected on the same basis as claim 7, are also allowable under 35 U.S.C. § 103 over *Traversat* and *Bachmann*.

Claim 8 is directed to the method of claim 1 in which the first parameter comprises the parameter of a set of parameters in a search request. *Traversat* allegedly teaches the limitation of claim 8. (Paper No. 7, page 5) (citing *Traversat*, FIGURE 2A and associated text). As discussed hereinabove, FIGURE 2A is directed to an exemplary LDAP directory. There is nothing identified therein that discloses an LDAP search request. Therefore, it necessarily follows that there is nothing identified therein that discloses the first parameter comprising a set of parameters in a search request. For at least this reason, and those discussed hereinabove in conjunction with claim 1, the Applicants respectfully contend that *Traversat* or *Bachmann*, alone or in combination, have not been shown to teach or suggest all of the limitations of claim 8. Additionally, no motivation beyond that which is asserted with respect to claim 1 is provided. Thus, the Applicants respectfully contend that a *prima facie* showing of obviousness has not been made with respect to claim 8 and claim 8 is, therefore, allowable under 35 U.S.C. § 103 over *Traversat* and *Bachmann*. Additionally, claims 17 and 26, rejected on the same basis as claim 8 are also allowable under 35 U.S.C. § 103 over *Traversat* and *Bachmann*.

Claim 9 depends from claim 8 and recites the method thereof in which the search request comprises an LDAP search request. Although the Applicants do not dispute that *Bachmann* refers to LDAP search requests, claim 9 is not directed to an LDAP search request in the abstract. Because, as discussed hereinabove, neither *Traversat* or *Bachmann*, alone or in combination, teach a first parameter comprising a parameter of a set of parameters in the search request, they necessarily do not teach such a search request comprising an LDAP search request. Therefore, because the references singly or in combination do not teach or suggest all of the limitations of claim 9, and because a motivation or suggestion for modifying the references upon which a *prima facie*

showing of obviousness may be predicated has not been provided, the Applicants respectfully contend that claim 9 is not demonstrated to be *prima facie* obvious over *Traversat* and *Bachmann*. Therefore, claim 9 is allowable over *Traversat* and *Bachmann* under 35 U.S.C. § 103. Additionally, claims 18 and 27 were rejected on the same basis as claim 9 are also allowable over *Traversat* and *Bachmann*.

IV. RESPONSE TO ARGUMENTS

The Examiner has found the Applicants arguments with respect to the drawings and the Applicants arguments with respect to the EID in *Bachmann* persuasive. The Applicants appreciate the Examiner's findings in this regard.

V. CONCLUSION

As a result of the foregoing, it is asserted by the Applicants that the remaining claims in the Application are in condition for allowance, and respectfully request an early allowance of such claims.

Applicants respectfully request that the Examiner call Applicants' attorney at the below listed number if the Examiner believes that such a discussion would be helpful in resolving any remaining problems.

Respectfully submitted,

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